



U.S. Department of Justice

United States Attorney  
Southern District of New York

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

April 18, 2021

**BY ECF**

The Honorable Laura T. Swain  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Keith Halliburton & Jeremiah Young*, 20 Cr. 499 (LTS)**

Dear Judge Swain:

The Government writes with the consent of the defendants to request a 30-day adjournment of the pretrial conference currently scheduled in this matter for April 19, 2021, at 12:00 p.m. The Government further requests an exclusion of time under the Speedy Trial Act until the new date for the conference.

On August 7, 2020, defendant Jeremiah Young was arrested after traveling from Indiana to Manhattan to pick up six kilograms of sham heroin from an undercover law enforcement officer. The next day, Young was charged by complaint with one count of conspiracy to distribute or possess with intent to distribute narcotics, in violation of 21 U.S.C. §§ 846 and 841(b)(1)(A). On August 28, 2020, defendant Keith Halliburton was arrested in Illinois for his role in coordinating the transaction between Young and the undercover officer. Halliburton was also charged by complaint with one count of conspiracy to distribute or possess with intent to distribute narcotics, in violation of 21 U.S.C. §§ 846 and 841(b)(1)(A). On September 21, 2020, the grand jury returned an Indictment charging both defendants with the same conspiracy count. Dkt. No. 7. The Government produced discovery on November 11, 2020, and December 15, 2020, and will continue to produce discovery as it becomes available.

The Government writes on behalf of the parties to request a 30-day adjournment of the pretrial conference currently scheduled in this matter for April 19, 2021, at 12:00 p.m. The Government has had discussions with counsel for the defendants about pretrial resolutions to this matter and discovery matters. An adjournment will permit the parties additional time to discuss a pretrial resolution of this matter and discuss pending discovery matters. Counsel for both defendants consent to the request for a 30-day adjournment.

The Government further moves to exclude time under the Speedy Trial Act from April 19, 2021, until the new date for the pretrial conference. The Government submits that the ends of justice served by such a continuance outweigh the best interests of the public and the defendant in a speedy trial because the continuance is designed to ensure the effective representation of counsel in the face of difficulties posed by the COVID-19 pandemic, to permit the parties to engage in

discussions regarding a potential pretrial resolution of this matter, and to reflect the limited availability of jury trials in this District in light of the COVID-19 pandemic.

Respectfully submitted,

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